



RECEIVABLE MANAGEMENT SERVICES

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Jorrissen Roy, Paralegal
Bankruptcy Services

June 9, 2005

Clerk of the Court
United States Bankruptcy Court for the District of Delaware
824 Market Street
Wilmington, Delaware 19801

FILED
2005 JUN 10 AM 9:59
CLERK
U.S. BANKRUPTCY COURT
DISTRICT OF DELAWARE

In Re: W.R. Grace & Co., et. al. Case No.: 01-1139-JKF
Claim No.: 339 Claim Amount: \$7,026.79
Claimant: Iron Mountain Records Management, Inc.
Debtor's Eleventh Omnibus Objection to Claims

Dear Clerk:

In response to the above-referenced matter, Receivable Management Services ("RMS"), Agent for Iron Mountain Records Management, Inc. ("IMRM"), filed a pre-petition claim on behalf of IMRM with the Court on or about July 20, 2001 for \$7,026.79, which was identified as claim no. 339.

Per Debtor's Eleventh Omnibus Objection to Claims (the "Objection"), the Debtor objects to the IMRM claim on the basis of "Materially Insufficient Supporting Information", indicating that the claimant has failed to provide the Debtors with sufficient supporting information to validate the claim. The Debtor request the Court that the Materially Insufficient Supporting Information Claims be disallowed and expunged.

We oppose the Debtor's request to disallow and expunge IMRM's claim. The debtor and the claimant have discussed that the claim amount of \$7,026.79 were for the services rendered for the month of March (pre-filing date) prior to the bankruptcy filing dated April 2, 2001. These pre-petition arrears were for the storage fees solely for the invoices they have discussed (*See Attached Exhibit "A"*). Also, I have attached a copy of the payment history detailing the balances due on the debtor's account (*See Attached Exhibit "B"*).

As Agent for IMRM, we kindly request that the proof of claim number 339 be considered on its merits. If the additional supporting documentation is still not sufficient please contact the undersigned as soon as possible enabling us to retain counsel in this case should we elect to do so.

Please do not hesitate to contact me with any questions you may have.

Yours truly,

Jorrissen Roy

Agent for Creditor - Iron Mountain Records Management, Inc.

Enclosure(s)

Cc: Steven D. Sass, Esq. (RMS)

Co-Counsel for Debtors and Debtors in Possession:

Rachel Reagler Schulman of Kirkland & Ellis, LLP

David W. Carickhoff, Jr. of Pachulski, Stang Ziehl, Young, Jones & Weintraub PC



Brian McGowan
WR Grace & Co.
5400 Broken Sound Blvd. NW
Boca Raton, FL 33487

Customer ID# F1291

Dear Mr. McGowan:

Pursuant to our conversation on May 22nd, I have arrived at the figures you requested. According to the information you provided me, you filed a Chapter 11 BK file docket # 0101139 effective April 2nd 2001. The attorney filing the case was Kirkland & Ellis.

As we discussed, you would not be responsible for any services on the 3/31/01 due date billing as we bill services thirty days in arrears. The services rendered would have been for the month of March, pre-filing date. The storage is billed thirty days in advance so any storage fees billed on the 3/31/01 due date would be for storage in April. I have computed the storage fees solely for the invoices we discussed. You stated you have the copies of the invoices for your reference.

The following is a breakdown of the invoice ranges due: 7729397-7729447
Attached is a calculator tape showing storage fee amounts only for the invoice ranges due.

Amount Due solely for Storage fees on all invoices is \$6,044.05. Please remit this payment today as your account is at the sixty day past due mark.

If you have any questions, please contact me at (954) 584-9334, ext. 313. Otherwise, I will follow up with you in a few days.

Thank you.

Michael Lubeck
South Florida Collections Dept.

cc: Julie Derise, Administrative Manager
Jim Lynch, GMA
Debbie Taylor, Supervisor, IMRM Division, Collections Dept.

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Year	Sales	Payments	Discount	Balance
99	103,105	95,930	0	7,174
98	90,431	95,949	0	5,518CR
97	70,449	64,932	0	5,518
96	70,564	70,564	0	0
95	68,102	66,102	0	0
2	22,086	21,398	0	688
1	93,733	86,414	0	7,320 <i>✓</i>
0	79,024	78,403	0	380CR